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FILED VIA ECF

Hon. P. Kevin Castel
United States District Judge
United States Courthouse
Southern District of New York
500 Pearl Street
New York, New York 10007

November 9, 2021

United States v. Mauricio HERNANDEZ-PINEDA
(S5) 15 Cr. 379 (PKC)

Dear Judge Castel:

As counsel of record for Mr. Hernandez-Pineda in this matter, I am writing to request an adjournment of the next conference in this matter, currently scheduled for November 22, 2021, for another sixty (60) days. I have discussed this with the government, which advises that it takes no position.

Again, the primary reason for the request is to allow the parties to continue active plea discussions that would obviate the need for trial. These discussions are still ongoing.

I am also still continuing to review the voluminous discovery in this matter with my client, and obtaining Spanish-language translations of documents that Mr. Hernandez-Pineda is now in the process of identifying.

Finally, I am also still in the process of trying to obtain certain documents in Honduras to assist in my client's defense. Once received, they too will have to be translated.

For these reasons, we ask that the conference in this matter, currently scheduled for November 22, 2021, be adjourned for sixty (60) days. We would have no objection to an exclusion under the Speedy Trial clock in these circumstances.

Respectfully submitted,

/s/

HOWARD LEADER

cc: Jason A. Richman, Esq.
Elinor Tarlow, Esq.
Jacob H. Gutwillig, Esq., Assistant United States Attorneys (VIA ECF)